

R. Hance Haney
Executive Director – Federal Regulatory

1020 19th Street NW, Suite 700
Washington, DC 20036

202 429 3125
202 293 0561 fax
Email hhaney@qwest.com



October 11, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

**Re: WC Docket No. 02-314 – Application of Qwest
Communications International Inc. for Authorization to
Provide In-Region, InterLATA Service in the States of
Colorado, Idaho, Iowa, Montana, Nebraska, North
Dakota, Utah, Washington and Wyoming**

Dear Ms. Dortch:

Qwest Communications International Inc. (“Qwest”) submits this filing at the request of Commission staff to respond to a claim made by Eschelon Telecom, Inc. (“Eschelon”) in the Qwest I and II proceedings regarding DSL repair.

In its comments filed in the Qwest I and Qwest II proceedings, Eschelon criticized Qwest’s procedures for repairing Qwest DSL provided in conjunction with UNE-P.¹ In response, Qwest explained that under certain limited circumstances for certain types of UNE-P (specifically, for UNE-P Centrex Plus and UNE-P Centron) with DSL, some of its repair records do not include information about DSL service.² Commission staff has asked Qwest to elaborate on Qwest’s plans to implement a fix for this.

On July 29, 2002, Qwest introduced a process improvement to provide Qwest’s repair personnel the information they need to take repair reports on DSL service provided with resold/UNE-P Centrex Plus and resold/UNE-P Centron. The process introduced by Qwest does not require CLECs to do anything differently than they have to date; the repair record is automatically created based on the manual order process. When the order completes in the service order processor (“SOP”), Qwest stops the order process

¹ See Eschelon Comments in WC Docket No. 02-148 at 9-10 (July 3, 2002); Eschelon Comments in WC Docket No. 02-189 at 22-23 (Aug. 1, 2002).

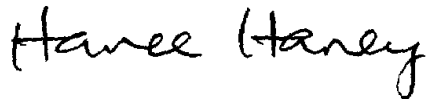
² See Reply Declaration of Lori A. Simpson, WC Docket No. 02-148, at 2-3; Reply Declaration of Lori A. Simpson, WC Docket No. 02-189, at 2-3.

and intervenes to post the order in Qwest's Customer Records Information System ("CRIS"). This posting activity results in a complete customer service record.

Qwest currently has in service approximately 20 accounts that combine UNE-P Centrex-type service or resold Centrex-type service with Qwest DSL. All of these accounts currently contain the required DSL information. Since the process described above has been in effect, Qwest has identified no additional instances in which its DSL repair personnel encountered the situation described by Eschelon. As a result, Qwest believes that its current process sufficiently addresses the issue, and that this process will continue to be sufficient given the low volume of Qwest DSL service provided with UNE-P. Qwest will investigate the possibility of implementing a mechanized solution should an increase in volumes make this necessary.

The 20 page limit does not apply to this filing

Sincerely,

A handwritten signature in black ink that reads "Hamee Haney". The signature is written in a cursive, slightly slanted style.

cc: E. Yockus
M. Carowitz
G. Remondino
R. Harsch
J. Jewel
P. Baker
C. Post
P. Fahn
B. Smith
J. Stanley
S. Vick
C. Washburn
S. Oxley
J. Orchard